

EXHIBIT G

From: Jonathan Bright
Sent: Friday, February 23, 2024 9:09 PM
To: Rae Crisler; rak_headwater@raklaw.com
Cc: [SERVICE FR] Samsung-Headwater; qe-headwater103@quinnemanuel.com
Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

Following up on our emails below, Samsung hereby notifies Headwater that it plans to move for leave to amend its Invalidity Contentions (previously served on November 30, 2023) to incorporate material specified in Samsung's supplemental responses to Headwater Interrogatory No. 1, including third party discovery served since Samsung's supplemental responses.

Please provide Headwater's position on Samsung's forthcoming motion for leave to amend its Invalidity Contentions.

Best,

Jonathan

From: Rae Crisler <crisler@fr.com>
Sent: Monday, February 12, 2024 11:30 AM
To: rak_headwater@raklaw.com
Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; qe-headwater103@quinnemanuel.com
Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

We write to further advise that Samsung has continued to diligently pursue third party discovery as reflected in its Second Supplemental Response to Plaintiff's Interrogatory No. 1 served on February 6, 2024, that incorporates content from Nokia and Google.

As noted below, for purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Best regards,

Rae

Rae Crisler :: Fish & Richardson P.C. :: 214-760-6138 direct

From: Jonathan Bright <jbright@fr.com>
Sent: Friday, January 12, 2024 9:59 PM
To: rak_headwater@raklaw.com

PUBLIC VERSION

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; ge-headwater103@quinnemanuel.com; Jeannet Santos <jsantos@fr.com>

Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROGs No 1

Counsel:

In relation to the supplemental response to Plaintiff's interrogatory No. 1 referenced below, Samsung has diligently pursued third party discovery and we notify you that Defendant Samsung intends to supplement its Invalidity Contentions with content from third party OpenWave specified in that supplemental response.

For purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Regards,

Jonathan

From: Jeannet Santos <jsantos@fr.com>

Sent: Friday, January 12, 2024 4:55 PM

To: rak_headwater@raklaw.com

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>

Subject: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROGs No 1

Counsel:

Attached for service, please find:

- **DEFENDANTS' SUPPLEMENTAL OBJECTIONS AND RESPONSES TO HEADWATER RESEARCH LLC'S FIRST SET OF INTERROGATORIES (NO. 1)**

The password to this document will be sent in a separate email.

Thank you,

Jeannet T. Santos, Sr. Litigation Paralegal

Supporting: Ashley A. Bolt, Brian P. Boyd, Erin P. Alper, Noah C. Graubart, & Steffen C. Lake

FISH & RICHARDSON P.C.

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"The Strength of the Team is each Member. The Strength of each Member is the Team." –Phil Jackson